Message

From: Cullen, Raymond [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CB92E061502245D9BE5AB9D24919A3C9-RCULLEN]
Sent: 2/8/2017 4:19:02 PM
To: Jurevis, John [Jurevis.John@epa.gov]
Subject: ArcelorMittal summary

Here's a short summary of the situation (or maybe a repeat of what Ryan already told you):

From what I understand, our visit to the site tomorrow will be a recon inspection because we won't have enough time to conduct a full CEI. So, we'll be focusing on just three outfalls, which are covered by two NPDES permits (I'll send these to you). Ryan and I first heard about ArcelorMittal's recent problems from Mike Beslow, OSC, almost a month ago. On 1/12-1/13/17, he and Andrew Maguire, another OSC, inspected the facility with the USCG and IDEM based on an anonymous report of oil sheen on water. Separately, at that time, a crane operator at the facility noticed the sheen and reported it to the appropriate people at the facility, but they never reported it to EPA. Mike observed a sheen mainly at Outfall 009 and also at Outfalls 010 and 001 and took split samples for fingerprinting with the facility. Outfall 009 at least discharges to the body of water linking Lake Michigan and the Grand Cal. Flow from this outfall is > 100M gpd.

In addition, Mike said he saw oil slugs at 009 & 010 and an ongoing sheen at 001 (in an 1/25/17 email, he stated that he knows of five oil slug discharges in the previous 2 weeks). The facility discharges used oil lubricant to these outfalls.

Oh, and about 2 weeks ago, Tom Mendez told me he witnessed improper sampling for FOG at 009 & 010 by the facility. They transfer samples between containers, which isn't allowed. Speaking of sampling, we're still waiting for the results of sampling that Mike did on 1/17 to check compliance with permit limits. I don't know if Tom has been involved much more with this place, but if you want, he may have some more insight for you. Mike too.

Regarding the IR camera, to benefit this inspection, since the primary purpose of tomorrow's visit is to find potential spills and inflow of oil into the system, maybe the camera can be used to track oil in the lines? Or if the temperature differential isn't large enough to distinguish oil from the rest of the liquid in the line (or if the volume of oil is too small, relatively), then at least the camera can be used to observe total liquid flow through the system to the outfalls.